

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

DOW JONES & COMPANY, INC. and NYP
HOLDINGS, INC.,

Plaintiffs,

v.

PERPLEXITY AI, INC.,

Defendant.

Civil Action No. 1:24-cv-07984-KPF

ORAL ARGUMENT REQUESTED

**NOTICE OF DEFENDANT’S MOTION TO DISMISS OR, IN THE ALTERNATIVE, TO
TRANSFER VENUE**

PLEASE TAKE NOTICE that upon the Second Amended Complaint filed by Plaintiffs Dow Jones & Company, Inc. and NYP Holdings, Inc. (Dkt. 46); the accompanying Memorandum of Law in Support of Defendant’s Motion to Dismiss or, in the Alternative, to Transfer Venue; the Declaration of Liane Pham; Defendant’s Request for Judicial Notice, the Declaration of Michelle Kao in support thereof, and all exhibits thereto; and all prior papers and proceedings herein, Defendant Perplexity AI, Inc. (“Perplexity”) will and hereby does move this Court, before the Honorable Katherine Polk Failla, at the Thurgood Marshall United States Courthouse, 40 Foley Square, New York, New York 10007, pursuant to Rules 12(b)(2), 12(b)(3), and 12(b)(6) of the Federal Rules of Civil Procedure, for an order dismissing Plaintiffs’ Second Amended Complaint or, in the alternative, transferring this action to the Northern District of California; dismissing Plaintiffs’ claims as to ten copyrighted works that were not timely registered before suit was filed; and granting such other and further relief as this Court may deem just and proper.

PLEASE TAKE FURTHER NOTICE that pursuant to the Court's order entered on January 21, 2025 (Dkt. 43), Plaintiffs' opposition shall be due on March 11, 2025, and Perplexity's reply shall be due on March 25, 2025.

Dated: February 18, 2025

Respectfully submitted,

By: /s/ James L. Day

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